

**Nicholas J. Henderson, OSB #074027**  
nhenderson@portlaw.com  
Motschenbacher & Blattner LLP  
117 SW Taylor St., Suite 300  
Portland, OR 97204  
Telephone: (503) 417-0508  
Facsimile: (503) 417-0521

*Of Attorneys for Vahan M. Dinihanian, Jr.*

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re:	Bankruptcy Case Nos.:
15005 NW Cornell LLC, Vahan M. Dinihanian, Jr.,	19-31883-dwh11 (Lead Case) 19-31886-dwh11
Debtors.	Jointly Administered Under Case No. 19-31883-dwh11
DEBTOR'S UNOPPOSED MOTION TO EXTEND TIME TO FILE LIQUIDATION ANALYSIS	

Vahan M. Dinihanian, Jr. (the “**Debtor**”), hereby moves this Court for the entry of an Order extending the deadline by which the Liquidation Analysis (the “**Motion**”) must be filed from October 16, 2020 to October 19, 2020. In support of the Motion, Debtor asserts the following:

1. The Court ordered that Debtor file a liquidation analysis by the close of business day on October 16, 2020.
2. Counsel for Debtor has been in depositions on another matter for the past two days and needs more time to prepare the liquidation analysis.

3. Counsel has conferred with opposing counsel and there is no objection to extending the deadline to file the Liquidation Analysis to October 16, 2020.

WHEREFORE, the Debtor prays for the Court to enter an Order in the form attached hereto as **Exhibit 1**, extending the deadline by which the Debtor's Liquidation Analysis must be filed, from October 16, 2020 to October 19, 2020.

DATED: October 16, 2020

MOTSCHENBACHER & BLATTNER LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB #074027

Telephone: 503-417-0508

E-mail: nhenderson@portlaw.com

Of Attorneys for Debtor Vahan M. Dinihanian,  
Jr.

**EXHIBIT 1**

**PROPOSED ORDER**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re:

15005 NW Cornell LLC,  
Vahan M. Dinihanian, Jr.,

Debtors.

Bankruptcy Case Nos.:

19-31883-dwh11 (Lead Case)  
19-31886-dwh11

Jointly Administered Under  
Case No. 19-31883-dwh11

DEBTOR'S UNOPPOSED MOTION TO  
EXTEND TIME TO FILE LIQUIDATION  
ANALYSIS

THIS MATTER having come before the Court on the Unopposed Motion to Extend Time to File Liquidation Analysis filed by Vahan M. Dinihanian, Jr. ("**Debtor**"). The Court having reviewed the motion, and being otherwise duly advised; now, therefore,

////

////

////

IT IS HEREBY ORDERED as follows:

- 1) Debtor's Motion to Extend Time is GRANTED.
- 2) The Debtor shall file the Liquidation Analysis by October 19, 2020.

###

Order Presented by:

MOTSCHENBACHER & BLATTNER LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB #074027

Telephone: 503-417-0508

E-mail: nhenderson@portlaw.com

Of Attorneys for Debtor Vahan M. Dinihanian, Jr.

**PARTIES TO SERVE:**

**ECF Electronic Service:** All participants.

**Service via First-Class Mail:** None.